

Jason S. Hartley CA Bar No. 192514
STUEVE SIEGEL HANSON LLP
550 West C Street, Suite 1750
San Diego, CA 92101
hartley@stuevesiegel.com
Tel: 619-400-5822
Fax: 619-400-5832

George A. Hanson MO Bar # 43450
(*Pro hac vice*)
Matthew L. Dameron MO Bar # 52093
(*Pro hac vice*)
STUEVE SIEGEL HANSON LLP
460 Nichols Road, Suite 200
Kansas City, Missouri 64112
hanson@stuevesiegel.com
dameron@stuevesiegel.com
Tel: 816-714-7100
Fax: 816-714-7101

Bradford B. Lear MO Bar # 53204
(*Pro hac vice*)
Todd C. Werts MO Bar # 53288
(*Pro hac vice*)
LEAR WERTS LLP
2003 W. Broadway, Ste.107
Columbia, Missouri 65203
Tel: 573-875-1991
Fax: 573-875-1985

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF CALIFORNIA**

JOSEPH BERTE, individually, and on behalf of a
class of others similarly situated, et al.

Plaintiffs,

v.

WIS HOLDINGS CORP, a Delaware corporation,

and

WASHINGTON INVENTORY SERVICE, d/b/a
WIS INTERNATIONAL, a California corporation,

Defendants.

Case No. 07 CV 1932 L (NLS)

**PLAINTIFFS' NOTICE OF
MOTION AND UNOPPOSED
MOTION FOR APPROVAL OF
FLSA SETTLEMENT**

Date: March 24, 2014

Time: 10:30 a.m.

Courtroom: 5B

1 TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, on March 24, 2014 at 10:30 a.m., or as soon thereafter as
3 this matter may be heard, in Courtroom 5B of the above-entitled Court, before the Honorable
4 James Lorenz, Plaintiffs will move this Court for an order granting their Unopposed Motion for
5 Approval of FLSA Settlement.

6 Plaintiffs seek Court approval of: (1) the parties' Settlement Agreement; (2) the creation
7 of a Settlement Fund in the amount of \$1,840,000; (3) the payment of a \$5,000 service award
8 from the Settlement Fund to Joseph Berte in the amount of \$5,000; (4) the payment of a \$1,000
9 service award to each of the twenty-six Plaintiffs who participated in depositions; (5) the
10 payment of attorneys' fees from the Settlement Fund in the amount of \$460,000; (6) the payment
11 of expenses from the Settlement Fund in the amount of \$99,321.30; and (7) the payment of
12 settlement administration expenses from the Settlement Fund.

13 This Motion is based on this Notice of Motion and Motion, and the corresponding
14 Memorandum of Points and Authorities. This motion is further based on all oral and documentary
15 evidence that may be presented before or at the time of hearing.

16 Dated: February 6, 2014

Respectfully submitted,

17 STUEVE SIEGEL HANSON LLP

18 /s/ Matthew L. Dameron

19 George A. Hanson MO Bar # 43450

(Pro hac vice)

20 Matthew L. Dameron MO Bar # 52093

(Pro hac vice)

21 460 Nichols Road, Suite 200

Kansas City, Missouri 64112

22 Tel: 816.714.7100

Fax: 816.714.7101

23 STUEVE SIEGEL HANSON LLP

24 Jason S. Hartley CA Bar No. 192514

550 West C Street, Suite 610

25 San Diego, CA 92101

Email: hartley@stuevesiegel.com

26 Tel: 619.400.5822

27 Fax: 619.400.5832

28

LEAR WERTS LLP
Bradford B. Lear MO Bar # 53204
(*Pro hac vice*)
Todd C. Werts MO Bar # 53288
(*Pro hac vice*)
2003 W. Broadway, Ste. 107
Columbia, Missouri 65203
Tel: 573.875.1991
Fax: 573.875.1985

ATTORNEYS FOR PLAINTIFFS